

From: <markcalhoon@comcast.net>
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To: <eric.oppenheimer@waterboards.ca.gov>
Subject: **Groundwater Concept paper**

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The Water Boards appear to be coming late to the issue with an approach that is both dated and counter productive to the progress that has already been made in a number of areas. I would invite you to look at some of the groundwater basin plans that have already been developed or being developed in a number of basins. A major component of any successful approach involves “engineering social change” through consensual, voluntary program development among stakeholders that is unique to each basin and dictated by the specifics of each groundwater basin. The concept paper suggests a “one size fits all” regulatory approach whereas the reality is that even if more funding was available (for the water boards) they could not put sufficient “cops on beat” to enforce such an approach. The Water Boards have an important perspective that has been overlooked in many groundwater basin plans which is the interaction and interdependency of surface water/groundwater which they should bring/champion within the existing basin advisory groups. Any attempt to take ascendancy or bring a regulatory based model will not only meet strong resistance but will inevitably lead to failure and regression from the progress that is already being made in many local areas.